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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOURNE VALLEY COURT TRUST,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.; MTC
FINANCIAL, INC., dba TRUSTEE
CORPS; RENEE JOHNSON; and
NEVADA LEGAL NEWS, LLC

Defendant.

CASE NO.: 2:13-CV-00649-JCM-GWF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
BOURNE VALLEY'S
COUNTERMOTION FOR FRCP 56(d)
RELIEF IN THE ALTERNATIVE**

(First Request)

Wells Fargo Bank, N.A. ("Wells Fargo") and Bourne Valley Court Trust ("Bourne Valley", and with Wells Fargo, the "Parties") through their counsel of record hereby respectfully request the Court enter an order, pursuant to Local Rules IA 6-1 and 7-1, extending the time for Wells Fargo to file its response to Bourne Valley's Countermotion for FRCP 56(d) Relief in the Alternative ("Countermotion" ECF No. 158) from its current due date of December 3, 2018, until **Tuesday, December 11, 2018.**

Bourne Valley's Countermotion was filed in conjunction with its Response (ECF No. 157) to Wells Fargo's Motion for Summary Judgment (ECF No. 136). Upon the filing of Bourne

Valley's Motion for Summary Judgment (ECF No. 153), the Parties stipulated to coordinate the briefing of their respective motions for summary judgment. *See* Stipulation and Order to Coordinate Briefing Schedules (ECF No. 154). The Court ordered the Parties to file their replies in support of their respective motions for summary judgment by December 10, 2018. Order (ECF No. 155). Because Bourne Valley's Countermotion relates to and contains arguments related to Wells Fargo's Motion for Summary Judgment, the Parties stipulate and agree that Wells Fargo can file its response to the Countermotion with its reply in support of its motion for summary judgment, currently due December 10, 2018.

This stipulation and extension is made by the Parties in good faith. The Stipulation is made for the benefit and convenience of Wells Fargo and not for any deleterious purpose. The extension is not intended to delay the proceedings.

DATED this 3rd day of December, 2018.

KIM GILBERT EBRON

By: /s/ Jacqueline A. Gilbert

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Attorneys for Bourne Valley Court Trust

DATED this 3rd day of December, 2018.

SNELL & WILMER L.L.P.

By: /s/ Wayne Klomp

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IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: December 3, 2018

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing document by the method indicated below:

<u>XXXX</u>	Electronic Service (CM/ECF)	_____	Federal Express
_____	U.S. Mail	_____	U.S. Certified Mail
_____	Facsimile Transmission	_____	Hand Delivery
_____	Email Transmission	_____	Overnight Mail

and addressed to the following:

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DATED this 3rd day of December, 2018.

/s/ Lara J. Taylor

An Employee of Snell & Wilmer L.L.P.

4822-3024-1409